

**Response to Question 9:**

SK-Earthlink LLC (“SKE”) requests streamlined treatment of this application pursuant to 47 CFR § 63.12 for the following reasons: (1) SKE is entitled to a presumption of non-dominance under 47 CFR § 63.10(a)(3) because its foreign carrier affiliates hold less than 50 percent of the international transport and local access markets on the foreign end of the relevant route; (2) SKE is not affiliated with any dominant U.S. carrier whose international switched or private line services it seeks to resell; and (3) SKE is not requesting authority to provide switched services over private lines to countries not previously authorized for service by the Commission.

**Response to Question 10:**

NA

**Response to Question 11:**Section 63.18

(i) SKE certifies that it is affiliated with the following foreign carriers in the country of South Korea: SK Telecom Co., Ltd. and SK Telink Co., Ltd

(j) SKE certifies that it seeks to provide international telecommunications services to foreign countries that include South Korea, where SK Telecom Co., Ltd., an entity that owns more than 25 percent of it is a foreign carrier in that country and controls SK Telink Co., Ltd., another foreign carrier in that country.

(k) South Korea is a Member of the World Trade Organization.

(l) With respect to the resale of international switched services of an unaffiliated U.S. carrier for the purposes of providing international telecommunications services to South Korea, SKE notes that its foreign affiliates lack sufficient market power on the foreign end of the U.S. – South Korea route to affect competition adversely in the U.S. market because these affiliates, SK Telecom Co., Ltd. and SK Telink Co., Ltd., hold shares of less than 50 percent in the international transport and local access markets on the foreign end of the route.

(m) With respect to regulatory classification under § 63.10 of the Commission’s Rules, SKE should be regulated as non-dominant for the provision of international telecommunications services to South Korea because, under 47 CFR § 63.10 (a)(3), SKE’s foreign affiliates lack sufficient market power on the foreign end of the U.S. – South Korea route to affect competition adversely in the U.S. market. SK Telecom Co., Ltd. is authorized to provide only domestic mobile wireless services and therefore has no market share in the international transport or local access market on the foreign end of the route. SK Telink Co., Ltd. has less than 50 percent market share in the international transport and local access markets on the foreign end of the route.

**Response to Question 12:**

SKE certifies that it seeks to provide international telecommunications services to the following destination country for which one or more of the statements contained in 47 CFR § 63.18(j)(1)-

(4) are true: South Korea. The related foreign carriers are SK Telecom Co., Ltd., and SK Telink Co., Ltd.

**Response to Question 13:**

NA